

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Loran Brown

Case Number 18-35505-KLP
Chapter 13

Debtor

MOTION TO EXPEDITE HEARING

COMES NOW, Loran Brown, the Debtor, by Counsel, and offer the following in support of his **Motion to Expedite Hearing** on the **Motion to Authorize the of Sell Real Estate**:

1. On November 1, 2018 , Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § §1301 **et seq.**
2. Debtor seeks to Sell Real Estate.
3. That an expedited hearing on the Motion *hearing is* necessary for the following reason:
4. **That the rules require that the Debtor give 21 days notice so that potential creditors can respond to his Motion.**
5. **That the closing date for the sell is on or about March 30, 2022..**
6. An expedited hearing is necessary under the circumstances and creditors and parties in interest will not be prejudiced by such expedited hearing being granted, in fact it is their best interest.

WHEREFORE, the Debtor respectfully request this Honorable Court to schedule a hearing to be heard on an expedited basis to consider the **Motion For Authority to Sell Real Estate** and for such other and further relief as the Court deems proper.

March 16, 2022

RESPECTFULLY SUBMITTED,
Loran Brown

By: /s/: Joseph Massie, III
Joseph Massie, III
115 N. 1st Street

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Loran Brown
Debtor

} Case Np. 18-35505-KLP
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} Chapter 13

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CERTIFICATION REGARDING REQUEST FOR EXPEDITED HEARING

In support of the attached request for an expedited hearing as required by Local Rule 9013-1(N), I hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing.
2. I have not created the emergency through any lack of due diligence, and
3. I have made a *bona fide* effort to resolve the matter without hearing.

March 16, 2022

RESPECTFULLY SUBMITTED,
Loran Brown

By: /s/: Joseph Massie, III
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CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on March 16, 2022, the foregoing **Motion to Expedite Hearing** has been served on and/or endorsed by all necessary parties.

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RESPECTFULLY SUBMITTED

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MOTION TO SHORTEN NOTICE PERIOD

COMES NOW, Loran Brown, ("the Debtor"), by Counsel, and file this Motion to Shorten the Notice Period for the Motion to Extend Automatic Stay pursuant to 11 USC §364(a) and 1304, Federal Rules of Bankruptcy Procedure 4001(c) and 9013, and Local Bankruptcy Rules 9013-1. In support thereof, Debtor respectfully states the following:

Jurisdiction

1. This court has exclusive jurisdiction over this matter pursuant to 28 USC §1334.
2. This proceeding is a core proceeding under 28 USC §157(b)(2)(A)(B)(K) and (O).
3. Venue is proper pursuant to 28 USC §1409.

Facts

4. On November 1, 2018, the Debtor filed in the Honorable Court a petition for relief under Chapter 13 of Bankruptcy Code 11 USC § 1301 **et seq.**
5. Debtor seeks to shorten the notice period for the **Motion For Authority to Sell Real Estate** from twenty-one (21) days to seven (7) days.

WHEREFORE, the Debtor prays that this Court enter an Order shortening the notice period for the **Motion For Authority to Sell Real Estate.**

March 16, 2022

RESPECTFULLY SUBMITTED,

Loran Brown

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CERTIFICATE OF SERVICE

I hereby certify that pursuant to Local Rule 9022-1, on March 16, 2022, the foregoing **Motion to Shorten Notice Period** has been served on and/or endorsed by all necessary parties.

March 16th, 2022

RESPECTFULLY SUBMITTED
Loran Brown

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